

August 2, 2021

Mr. David Albright
Manager, Groundwater Protection Section
USEPA Region 9 (WTR-4-2)
75 Hawthorne St
San Francisco, CA 94105

Subject: Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1
Monthly Update for AL/AQL Exceedances at Supplemental Monitoring Well M60-O

Dear Mr. Albright:

Florence Copper is providing this monthly update of supplemental monitoring well M60-O alert level (AL) and/or Aquifer Quality Limit (AQL) exceedances under Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1 (Permit).

Florence Copper has been voluntarily monitoring M60-O monthly for the parameters listed in Table 1, and previously submitted a monthly update report on July 2, 2021. The Table below has been updated to include the most recent laboratory results from the monthly sample collected on June 15, 2021 and received on July 7, 2021. Results from the monthly sample collected on July 19, 2021 are pending.

Table 1. M60-O Monthly Sampling Results

Parameter	UIC AL	UIC AQL	1/7/21	2/22/21	3/23/21	4/14/21	5/18/21	6/15/21
Adj. gross alpha, (pCi/L)	17.4	17.4	18.7±2.5	7.8±2.4	26.6±2.5	22.2±2.5	11.4±2.6	27.1±2.6
Radon (pCi/L)	2480	--	NA	NA	NA	3073.6 ±308.1	9,129 ±915.6	2985.3 ±299.4

BOLD values are exceedance of AL and/or AQL

NA: not analyzed

The BHP Copper Evaporation Pond was put into service on July 8, 2021. Operation of this Pond increases Florence Copper's capacity to store and evaporate neutralized solutions, and enables significantly higher recovery rates in the wellfield. The higher recovery rates, and other adjustments to flows in the wellfield, should advance rinsing activities, and mitigate the exceedances. Hydraulic control in the wellfield has been constantly maintained.

Florence Copper will continue monthly sampling of M60-O for Level I parameters and the parameters which exceeded the ALs and AQLs and will report these results monthly to EPA until all concentrations are below the ALs and AQLs.

Please feel free to contact me should you have any questions or comments.

Sincerely,
Florence Copper, Inc.



Brent Berg
General Manager

Cc: Nancy Rumrill, EPA Region 9
Maribeth Greenslade, ADEQ